

WEIL, GOTSHAL & MANGES LLP
Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**SUPPLEMENTAL DECLARATION OF KEITH E.
EGGLETON IN SUPPORT OF REORGANIZED
DEBTORS' OMNIBUS MOTION TO ENFORCE THE
DISCHARGE AND INJUNCTION PROVISIONS OF
PLAN AND CONFIRMATION ORDER AGAINST
CERTAIN PENDING ACTIONS**

Date: May 24, 2023

Time: 10:00 a.m. (Pacific Time)

Place: **(Tele/Videoconference Only)**

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Keith E. Eggleton, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am a member of Wilson Sonsini Goodrich & Rosati, P.C. (“WSGR”), counsel
5 for Pacific Gas and Electric Company and PG&E Corporation (together, the “**Debtors**” or as reorganized
6 pursuant to the Plan, the “**Reorganized Debtors**”) as defendants in a number of California state court
7 actions relating to the 2017 North Bay Fires and 2018 Camp Fire. I am licensed to practice law in the
8 State of California and am admitted to practice before this Court.

9 2. I am authorized to submit this Supplemental Declaration (the “**Declaration**”) on
10 behalf of the Reorganized Debtors in support of the *Reorganized Debtors’ Omnibus Motion to Enforce*
11 *the Discharge and Injunction Provisions of Plan and Confirmation Order Against Certain Pending*
12 *Actions* (the “**Motion**”).¹ The facts set forth in this Declaration are based upon my personal knowledge
13 and my review of relevant documents. If called upon to testify, I would testify competently to the facts
14 set forth in this Declaration.

15 3. Since filing the Motion, counsel for the Reorganized Debtors received positive
16 informal responses from two attorneys for the State Court Plaintiffs.

17 4. The first was from Christian Krankemann, counsel in eleven known Pending
18 Actions in Sonoma County Superior Court. I believe Plaintiffs in those actions have now filed requests
19 for dismissal, and the dockets reflect that those eleven Pending Actions in Sonoma County Superior
20 Court have been dismissed.

21 5. The second was from Larry Peluso, counsel in one known Pending Action
22 pending in San Francisco Superior Court. Mr. Peluso has informed my firm that he is attempting to file
23 papers requesting dismissal of his Pending Action in San Francisco County Superior Court.

24 6. To my knowledge, two other attorneys (John Meyer and Cecelia Fusich)—co-
25 counsel in one known Pending Action in Butte County Superior Court—did not respond formally or

26
27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in
28 the Motion.

1 informally to the Motion.

2 7. After the Motion was filed, while preparing for a court hearing in the *Robinson*
3 Pending Action involving State Court Plaintiffs represented by Richards Willis PC, I discovered a new
4 action against the Debtors that I believe is asserting what would be Fire Victim Claims as defined in the
5 Plan. This case is pending in the San Francisco Superior Court as *Johnson, et al. v. PG&E Corporation,*
6 *et al.*, Case No. CGC-19-579965. Richards Willis PC is counsel for the plaintiffs in this action. I do not
7 believe the Debtors were ever served with a summons in this action.

8 8. The *Robinson* and *Johnson* cases were both scheduled for order to show cause
9 hearings on May 2, 2023, concerning potential dismissal of the cases.

10 9. Shortly before the hearings, the plaintiffs in those cases filed the statements
11 attached as **Exhibit A** hereto.

12 10. In response, the San Francisco County Superior Court canceled the order to show
13 cause hearings and scheduled case management conferences “for status report re bankruptcy” for
14 September 6, 2023.

15 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing is true
16 and correct to the best of my knowledge, information, and belief.

17
18 Dated: May 17, 2023
19 Palo Alto, California

20 /s/Keith E. Eggleton
21 Keith E. Eggleton
22
23
24
25
26
27
28